

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

CASE NO. 24-CR-00478-1

UNITED STATES OF AMERICA,

Plaintiff,

VS.

SHELDON DOUNN,

Defendant.

/

**JOINT MOTION TO CONTINUE REVOCATION PROCEEDINGS AND
TRIAL DATE**

Sheldon Dounn, through counsel, and Department of Justice Trial Attorney, Andrew Pennebaker, hereby file this Joint Motion to Continue Revocation Proceedings and Trial Date, and in support thereof state:

1. On May 2, 2025, the Court issued a warrant for the arrest of Sheldon Dounn pursuant to the Government's Motion to Revoke Bond. The Court in Fort Lauderdale, Florida set a pretrial detention hearing for May 5, 2025. That same day, this Court scheduled Mr. Dounn's Initial Appearance on his Bond Revocation Proceeding for June 3, 2025.
2. Mr. Dounn retained undersigned for purposes of that hearing.
3. After extensive conversations with Government Trial Counsel Pennebaker and Mr. Dounn, the Government refrained from seeking pretrial detention. Instead, the parties agreed to a modification of Mr. Dounn's bond requiring the co-signatures of his two adult sons and collateral from the home of Mr. Dounn's ex-wife. In addition, during those conversations, undersigned counsel advised Government Trial Counsel Pennebaker that he would be retained by his sons for Mr.

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Dounn's case in Houston, Texas which allowed the parties to discuss the substance of the Government's accusations and evidence against Mr. Dounn.

4. On May 22, 2025, counsel for Mr. Dounn filed a Motion for Substitution of Counsel which was granted the following day. The Government is the process of providing counsel with the voluminous discovery in this matter, but at same time the parties have discussed the specifics contained in the discovery and the very detailed allegations set forth in the Indictment.

5. The trial date in this matter is presently scheduled for July 21, 2025. Because of the lengthy conversations between the parties, we can represent to the Court the matter will very likely result in this case being resolved via change of plea. However, to ensure undersigned provides effective assistance of counsel, he must review the discovery with Mr. Dounn. In addition, this allows the parties to engage in plea negotiations, for the Government to meet with Mr. Dounn, and to discuss the evidence against him as well as entertain the possibility of Mr. Dounn's cooperation with law enforcement.

6. For these reasons (and summer travel plans), the parties are respectfully requesting a continuance of both the bond revocation proceedings and the trial date, to early September, 2025. The parties are confident this matter will be resolved prior to the trial date and will so notify the Court so both matters may be scheduled on the same date.

WHEREFORE, the parties respectfully request that the Joint Motion to Continue Revocation Proceedings and the Trial Date be granted, and both be rescheduled for early September, 2025.

Respectfully submitted,

/s/ Marc David Seitles
Marc David Seitles
Fla. Bar No. 0178284
Seitles & Litwin, P.A.

Seitles & Litwin, P.A.

Courthouse Center
40 N.W. 3rd Street
Penthouse One
Miami, FL 33128
Tel: (305) 403-8070
Fax: (305) 403-8210
Email: mseitles@seitleslaw.com

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2025, undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing to: All counsel of record.

/s/ Marc David Seitles
Marc David Seitles, Esq.